

AB:ADR  
F. #2022R00390

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- against -

KWAN BROWN,

Defendant.

----- X

THE GRAND JURY CHARGES:

FELON IN POSSESSION OF AMMUNITION

1. On or about April 9, 2022, within the Eastern District of New York and elsewhere, the defendant KWAN BROWN, knowing that he had previously been convicted in one or more courts of three or more crimes punishable by a term of imprisonment exceeding one year, each constituting a violent felony and committed on occasions different from one another, did knowingly and intentionally possess in and affecting commerce ammunition, to wit: Federal and Hornady .380 auto caliber cartridges.

(Title 18, United States Code, Sections 922(g)(1), 924(e)(1) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

2. The United States hereby gives notice to the defendant that, upon his conviction of the offense charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 924(d)(1) and Title 28, United States Code,

**\*\*FILED\*\***

**3:58 pm, Jul 19, 2022**

**U.S. DISTRICT COURT**

**EASTERN DISTRICT OF NEW YORK**

INDICTMENT

Cr. No. **1:22-cr-00330 (HG)(SJB)**

(T. 18, U.S.C., §§ 922(g)(1), 924(d)(1),  
924(e)(1) and 3551 et seq.; T. 21,  
U.S.C., § 853(p); and T. 28, U.S.C.,  
§ 2461(c))



Section 2461(c), which require the forfeiture of any firearm or ammunition involved in or used in any knowing violation of Title 18, United States Code, Section 922 or Section 924.

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

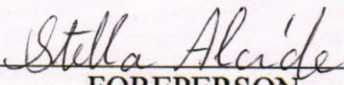
- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided

without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 924(d)(1); Title 21, United States Code, Section 853(p); Title 28, United States Code, Section 2461(c))

A TRUE BILL

  
FOREPERSON

BREON PEACE  
UNITED STATES ATTORNEY  
EASTERN DISTRICT OF NEW YORK

By:

  
Assistant U.S. Attorney

F. #2022R00390  
FORM DBD-34  
JUN. 85

No. \_\_\_\_\_

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**UNITED STATES DISTRICT COURT**

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

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THE UNITED STATES OF AMERICA

vs.

KWAN BROWN,

Defendant.

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**INDICTMENT**

(T. 18, U.S.C., §§ 922(g)(1), 924(d)(1), 924(e)(1) and 3551 et seq.; T. 21,  
U.S.C., § 853(p); and T. 28, U.S.C., § 2461(c))

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*A true bill.*

*Stella Alcide*

Foreperson

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Filed in open court this \_\_\_\_\_ day,

of \_\_\_\_\_ A.D. 20 \_\_\_\_\_

Clerk

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Bail, \$ \_\_\_\_\_

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*Andrew D. Reich, Assistant U.S. Attorney (718) 254-6452*